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16 *Attorneys for Defendants Bruce Breslow,
17 Terry Reynolds, Scott Whittemore,
18 Ruben Aquino, Genevieve Hudson,
19 Ronald Grogan, Charles Harvey,
20 Antoine "Chris" Rivers, and CJ Manthe*

21 **UNITED STATES DISTRICT COURT**
22
DISTRICT OF NEVADA

23 JOSEPH MORGAN, an individual,

24 Plaintiff,

25 v.

26 THE STATE OF NEVADA, *ex rel.* its
27 DEPARTMENT OF BUSINESS AND
28 INDUSTRY, STATE OF NEVADA *ex rel.*
its TAXICAB AUTHORITY; BRUCE
BRESLOW, in his individual capacity;
SCOTT WHITTEMORE, in his individual
capacity; RUBEN AQUINO, in his individual
capacity; GENEVIEVE HUDSON, in her
individual capacity; RONALD GROGAN, in
his individual capacity; CHARLES
HARVEY, in his individual capacity;
ANTOINE "CHRIS" RIVERS, in his
individual capacity; CJ MANTHE, in her
individual capacity; DOES I through X
inclusive; and ROES XI through XX,
inclusive,

29 Defendants.

30 Case No. 2:19-cv-02239-KJD-DJA

31
STIPULATION AND ORDER
EXTENDING TIME FOR FRCP 26
INITIAL DISCLOSURES
(First Request)

32 Defendants BRUCE BRESLOW, TERRY REYNOLDS, SCOTT WHITTEMORE,
33 RUBEN AQUINO, GENEVIEVE HUDSON, RONALD GROGAN, CHARLES HARVEY,

1 ANTOINE “CHRIS” RIVERS, and C.J. MANTHE, by and through their attorneys, AARON D.
2 FORD, Attorney General for the State of Nevada, SCOTT H. HUSBANDS, Deputy Attorney
3 General, AND GERALD L. TAN, Deputy Attorney General, and Plaintiff JOSEPH MORGAN,
4 by and through his counsel E. BRENT BRYSON, ESQ. of E. BRENT BRYSON, LTD.,
5 pursuant to FRCP 26(a)(1)(C), LR IA 6-1, and LR IA 6-2, hereby stipulate and agree to a 14-
6 day extension of time, up to and including June 16, 2020, for the parties to exchange their
7 mandatory FRCP 26 initial disclosures.

8 This is the first request for an extension of time by the parties regarding their mandatory
9 FRCP 26 initial disclosures. The parties are currently required to exchange their initial
10 disclosures on June 2, 2020 as that is the date that is 14 days after counsel met for the required
11 FRCP 26(f) conference.

12 This request is based on good cause and not for purpose of delay. The parties base this
13 request on staffing and logistical challenges directly attributable to the COVID-19 pandemic.

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1 Upon agreement by and between all the parties, through their respective counsel, the
2 undersigned counsel respectfully request that this Court grant the parties a 14-day extension
3 of time, up to and including, June 16, 2020, to exchange the mandatory initial disclosures
4 required by FRCP 26.

5 DATED: June 2, 2020

6 AARON D. FORD
7 Attorney General

E. BRENT BRYSON, LTD.

8 By: /s/ Scott H. Husbands
9 SCOTT H. HUSBANDS
Deputy Attorney General
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By: /s/ E. Brent Bryson

E. BRENT BRYSON
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Scott Whittemore, Ruben Aquino, Genevieve
18 Hudson, Ronald Grogan, Charles Harvey,
Antoine "Chris" Rivers, and CJ Manthe
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14 Attorney for Joseph Morgan

21 **ORDER**

22 IT IS SO ORDERED.
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DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

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26 DATED: JUNE 3, 2020
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